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December 15, 2004

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DEC 1 6 2004

PUBLIC SERVICE COMMISSION

Elizabeth O'Donnell Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40601

RE: Patricia Conner Young v. Louisville Gas and Electric Company

Case No. 2004-00425

Dear Ms. O'Donnell:

Enclosed please find and accept for filing the original and ten (10) copies Louisville Gas and Electric Company's Reply to Response of Patricia Conner Young in the above-referenced matter. Please confirm your receipt of this filing by placing the stamp of your Office with the date received on the enclosed additional copies and return them to me in the enclosed self-addressed stamped envelope.

Should you have any questions or need any additional information, please contact me at your convenience.

Yours very truly,

Allyson K. Sturgeon

AKS/ec Enclosures

cc: Parties of Record

COMMONWEALTH OF KENTUCKY

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BEFORE THE PUBLIC SERVICE COMMISSION

DEC 1 6 2004

PUBLIC SERVICE

| PATRICIA CONNER YOUNG |) | |
|-----------------------|---|---------------------|
| |) | |
| COMPLAINANT |) | |
| V. |) | CASE NO. 2004-00425 |
| |) | |
| LOUISVILLE GAS AND |) | |
| ELECTRIC COMPANY |) | |
| |) | |
| DEFENDANT |) | |

In the Matter of:

REPLY OF LOUISVILLE GAS AND ELECTRIC COMPANY TO RESPONSE OF PATRICIA CONNER YOUNG DATE-STAMPED NOVEMBER 18, 2004

On October 25, 2004, Patricia Conner Young ("Ms. Young") filed a Complaint against Louisville Gas and Electric Company ("LG&E"). In response to the October 29, 2004 Order of the Kentucky Public Service Commission ("Commission"), LG&E filed a timely Answer on November 8, 2004. Although Ms. Young filed a pleading entitled "Dispute Billing and Response to Order to Satisfy or Answer" (hereinafter "Response") on November 18, 2004, counsel for LG&E was not served a copy of this pleading and did not learn of its existence until faxed a copy by Commission Staff on December 8, 2004. As its Reply to Ms. Young's Response, LG&E states as follows:

In July of 2003, Ms. Young filed for bankruptcy under Chapter 7. This bankruptcy was converted to Chapter 13 in November of 2003, and then converted back to Chapter 7 on June 3, 2004. Ms. Young's pre-bankruptcy petition debts were discharged by the September 29, 2004 Order of the Bankruptcy Court. During this same time period, Patricia Conner Young LLC also filed for bankruptcy under Chapter 13. This bankruptcy was converted to Chapter 11 on March 2, 2004 and dismissed on May 18, 2004. This bankruptcy was reinstated on June 10, 2004, and dismissed once again on September 15, 2004.

In reviewing Ms. Young's account once again to prepare this Reply, LG&E identified \$350.84 of pre-petition bankruptcy debt that was inadvertently remaining on Ms. Young's account. This amount has now been written off of her account and now appears as a credit. The total due and owing on Ms. Young's account as of December 15, 2004 is \$372.39. Her next payment for service through November 30, 2004 is due to LG&E by December 15, 2004. A copy of her recent account activity is attached hereto. In her Response, Ms. Young asserts that LG&E reassessed her account a charge of \$301.01 (which she believed to be pre-petition bankruptcy debt). In fact, the \$301.01 amount was inadvertently moved to her account on October 4, 2004 and was immediately removed upon discovery of the error within minutes on the same day. This amount was in no way related to her pre-petition bankruptcy debt and is no longer on her account.

Because of her payment history, LG&E charged Ms. Young a \$240 deposit on July 22, 2004, in accordance with its Commission-approved tariff. On September 21st, October 6th, and December 8th, 2004, Ms. Young's residential electric service to 610 Oak Branch Road was terminated for non-payment. On November 4th and 23rd, 2004, Ms. Young made payments of \$250 and \$260, respectively. Most recently, Ms. Young made a payment of \$75 on December 8, 2004. The \$120 "other charge", referred to in Ms. Young's Response and identified on her November bill, consists of the final (of three) \$80 installments toward payment of the \$240 deposit charged in July, 2004, as well as two separate \$20 reconnect charges relating to the September and October terminations of service to her home.

As to Ms. Young's assertions regarding utility service to 1718 West Muhammad Ali, electric service to that address is now being provided. In the future, if a lawfully-registered business to which Ms. Young is affiliated requests electric service from LG&E, service will be provided subject to the advance payment of a deposit determined in accordance with Kentucky

Public Service Commission regulations and LG&E's applicable tariffs. Additionally, as to service in Ms. Young's individual capacity, service will continue to be provided so long as she remits timely payments to LG&E in order that her account remains current.

WHEREFORE, for all of the reasons set forth above, as well as in its Answer of November 8, 2004, Louisville Gas and Electric Company respectfully requests:

- (1) that the Complaint herein be dismissed without further action being taken by the Commission;
 - (2) that this matter be closed on the Commission's docket; and
 - (3) that LG&E be afforded any and all other relief to which it may be entitled.

Dated: December 15, 2004

Respectfully submitted,

Kendrick R. Riggs

Allyson K. Sturgeon

Ogden Newell & Welch PLLC

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COUNSEL FOR LOUISVILLE GAS AND ELECTRIC COMPANY

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Answer was served on the following persons on the 15th day of December 2004, U.S. mail, postage prepaid:

Ms. Patricia Conner Young 610 Oak Branch Road Louisville, Kentucky 40245

ounsel for Louisville Gas and Dectric Co

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